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World's Children*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO**

In re

PROFESSIONAL FINANCIAL
INVESTORS, INC., *et al*,

Debtors.

Case No. 20-03064
(Jointly Administered)

Chapter 11

MICHAEL GOLDBERG,
TRUSTEE OF THE PFI TRUST,

Plaintiff,

v.

WORLD'S CHILDREN,

Defendant.

AP Case No. 22-03095

**JOINT STATUS CONFERENCE
STATEMENT AND JOINT
DISCOVERY PLAN**

Date: April 13, 2023

Time: 2:00 p.m.

Place: Telephonic/ Videoconference
Courtroom 19
450 Golden Gate Avenue
16th Floor
San Francisco, CA

Judge: Hon. Hannah L. Blumenstiel

Plaintiff Michael Goldberg, the duly-appointed trustee for the PFI Trust (“Plaintiff”) and Defendant World’s Children (“Defendant”) by and through their respective counsel (collectively “the Parties”), hereby submit their joint status conference statement and discovery plan.

1. DISCOVERY CONFERENCE: The discovery conference occurred on March 20, 2023. At the conference, the parties discussed the nature and basis of the claims stated in the complaint and Defendant’s defenses. The Parties, by and through counsel, have good communication channels. The Parties agree to continue to mediate informally.

2. PLEADINGS: The pleadings are at issue.

3. DISCOVERY PLAN: The Parties propose the following:

A. Any changes that should be made in the timing, form, or requirements of the initial disclosures under Rule 26(a), including a statement of when initial disclosures were made or will be made.

Plaintiff served initial disclosures on February 8, 2023 and Defendant served initial disclosures on March 17, 2023. The parties do not believe any changes in time, form, or requirements are necessary or warranted.

B. The subjects on which discovery may be needed, when discovery should be completed, and whether discovery should be conducted in phases or be limited to or focused on particular issues.

Plaintiff and Defendant plan to conduct discovery to ascertain facts concerning the claims set forth in the Complaint and the defenses in the Answer. The Parties agree to the following discovery schedule:

- Fact Discovery Cutoff: July 14, 2023
- Expert Disclosures: July 31, 2023
- Rebuttal Expert Disclosures: August 31, 2023
- Expert Discovery Deadline: September 22, 2023
- Deadline for Filing of Dispositive Motions: October 6, 2023

C. Any other orders that the court should issue under Rule 7016(b) and 7026(a)(1)

The Parties do not request that the court enter any orders under Fed. R. Bankr. P. 7016(b) and (c) and 7026(a)(1) at this time.

1 The Parties anticipate filing a stipulation for a protective order regarding certain discovery
2 items.

3 Dated: March 22, 2023

PACHULSKI STANG ZIEHL & JONES LLP

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5 BY: /s/ John D. Fiero
6 JOHN D. FIERO
Attorneys for Plaintiff

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8 Dated: March 22, 2023

COOPER & SCULLY, P.C.

9
10 BY: /s/ Julie Koenig
11 Julie Koenig
Attorney for Defendant

STATE OF CALIFORNIA)
CITY OF SAN FRANCISCO)

I, Oliver Carpio, am employed in the city and county of San Francisco, State of California. I am over the age of 18 and not a party to the within action; my business address is One Sansome Street, 34th Floor, Suite 3430, San Francisco, CA 94104-4436.

On **March 22, 2023**, I caused to be served the following documents in the manner stated below:

• **JOINT STATUS CONFERENCE STATEMENT AND JOINT DISCOVERY PLAN**

<input checked="" type="checkbox"/>	<p>TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): The foregoing document was served by the court via NEF and hyperlink to the document. On March 22, 2023, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below.</p> <ul style="list-style-type: none"> • John D. Fiero jfiero@pszilaw.com, ocarpio@pszilaw.com • Julie Koenig julie.koenig@cooperscully.com 		
<input type="checkbox"/>	(BY OVERNIGHT DELIVERY) By sending by FedEx and/or USPS Express Mail to the addressee(s) as indicated on the attached list.		
<input checked="" type="checkbox"/>	<p>(BY MAIL) I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at San Francisco, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.</p> <table border="1" data-bbox="578 1129 1281 1297"> <tr> <td> Julie Koenig Cooper & Scully, P.C. 815 Walker St. #1040 Houston, TX 77002 </td> <td> Charles H. Bolcom Moris Davidovitz Cooper & Scully, P.C. 423 Washington St., #400 San Francisco, CA 94111 </td> </tr> </table>	Julie Koenig Cooper & Scully, P.C. 815 Walker St. #1040 Houston, TX 77002	Charles H. Bolcom Moris Davidovitz Cooper & Scully, P.C. 423 Washington St., #400 San Francisco, CA 94111
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<input type="checkbox"/>	(BY EMAIL) I caused to be served the above-described document by email to the parties indicated on the attached service list at the indicated email address.		

I declare under penalty of perjury, under the laws of the State of California and the United States of America that the foregoing is true and correct.

Executed on March 22, 2023 at San Francisco, California.

/s/ Oliver Carpio
Legal Assistant